

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
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DATE FILED: 2/23/2015

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GEORGE PAUL CHAMBERS,

Plaintiff,

v.

GENPACT LLC,

Defendant.
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Case No: 14 CV 8215 (ER)(GWG)

**PROPOSED CIVIL CASE
MANAGEMENT PLAN AND
SCHEDULING ORDER**

Counsel for Plaintiff, George Chambers, and Defendant Genpact LLC, respectfully submit this Proposed Civil Case Management Plan and Scheduling Order as required by Judge Ramos' Order dated February 4, 2015.

1. All parties do not consent to conducting all further proceedings before a Magistrate Judge, including motions and trial, pursuant to 28 U.S.C. § 636(c). The parties are free to withhold consent without adverse substantive consequences.
2. This case is to be tried to a jury.
3. The next case management conference is scheduled for June 19, 2015, at 11:00AM.

Automatic Disclosures

4. The parties will exchange automatic disclosures required by Rule 26(a)(1) of the Federal Rules of Civil Procedure by March 6, 2015.

Defendant's Answer

5. Defendant shall serve and file its Answer to Plaintiff's Amended Complaint by March 6, 2015


Discovery

6. The parties agree that all initial discovery requests, including initial document production demands and interrogatories, shall be served upon the responding parties by March 6, 2015.
7. The parties agree that all factual discovery shall be completed by June 19, 2015.
8. The parties shall be limited to two depositions per side including any Fed. R. Civ. P. 30(b)(6) depositions, except upon leave of the court,. Plaintiff's deposition shall be conducted before the deposition(s) of Defendant's witnesses(es).
9. If one of the parties elects to conduct expert discovery, they must designate an expert within 90 days from the date of entry of this order. If a party(ies) designates an expert, within two weeks of the designation, the parties will submit a revised scheduling order for expert discovery and dispositive motions . If expert discovery is not needed, then the below schedule for dispositive motions will remain in effect.

Dispositive Motions — *Parties are directed to move in accordance with my individual practices section 2. A. ii.*

10. The parties agree that the any dispositive motions shall be served and filed by July 17, 2015.
11. Opposition papers to any dispositive motions shall be served and filed by July 31, 2015.
12. Reply papers to any dispositive motions shall be served and filed by August 10, 2015.

SO ORDERED:



Edgardo Ramos, U.S.D.J.

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Dated: New York, New York

Feb. 23, 2015